



CB&I
2700 Chandler Avenue, Building C
Las Vegas, NV 89120
Tel: +1 702 795 0515
Fax: +1 702 795 8210
www.CBI.com

July 31, 2013

Dania Zinner
USEPA, Region 8
1595 Wynkoop Street (8EPR-SR)
Denver, CO 80202-1129

Document ID #: 2019-07312013-1

EPA CONTRACT NUMBER EP-W-10-033
TASK ORDER NUMBER 2019
QUALITY ASSURANCE SUPPORT FOR THE LIBBY ASBESTOS SITE

Dear Ms. Zinner:

Enclosed please find the Second Quarter 2013 Quarterly QA Report. This report is a deliverable under Task 6 of Task Order 2019.

If you have any questions, please feel free to contact me.

Sincerely,

Timothy L. Vonnahme
Audit Group Manager, QATS Program
CB&I Federal Services, LLC
Phone: (702) 895-8729
E-Mail Address: timothy.vonnahme@cbifederaleservices.com

cc: Administrative Contracting Officer (letter only)
Audit Group Files





CB&I
2700 Chandler Avenue, Building C
Las Vegas, NV 89120
Tel: +1 702 795 0515
Fax: +1 702 795 8210
www.CB&I.com

TECHNICAL MEMORANDUM

TO: Dania Zinner, USEPA Region 8

FROM: Michael Lenkauskas, Shaw Environmental, Inc. (a CB&I Company)

DATE: July 31, 2013

SUBJECT: Second Quarter 2013 Quarterly QA Report – Task Order 2019

This technical memorandum represents the Second Quarter 2013 Quarterly QA Report for Task Order 2019, *Quality Assurance Support for the Libby Asbestos Site*. It includes, by task and QA element, a summary of QA procedures for the period of April 1, 2013 to June 30, 2013. The QA elements addressed in this quarterly report are consistent with Tasks 1 through 9 of Task Order 2019, and represent work performed by Shaw Environmental, Inc. (a CB&I Company) under its Quality Assurance Technical Support contract EP-W-10-033.

Task 1 – Review of Existing Quality Documents

QATS continued to support the development or revision of project-specific laboratory modifications and standard operating procedures (SOPs). Table 1 provides the status of the laboratory modifications reviewed during the quarter and as of the last monthly conference call held on June 24, 2013. Following Table 1 is a detailed description of each laboratory modification.

Table 1 – Status of Laboratory Modifications Reviews

Lab Mod	Description Summary	Status	Effective Date
LB-000066E	Applies to investigative samples for TEM from the Libby site.	ESAT Review	NA
LB-000067C	Consolidates three TEM modifications into one.	EPA Approved	4/1/2013
LB-000092	Tree bark and duff samples not prepared as specified in SOP.	RESI Update	NA

- LB-000066E - This modification applies to all investigative samples (as defined by the relevant SAPs and their SAP Analytical Summary Sheets) analyzed by TEM (regardless of the specific TEM method) for the Libby Asbestos Site. This modification does not apply to non-investigative samples unless otherwise indicated by the SAP Analytical Summary Sheet. ESAT is currently combining LB-000066C and LB-000066D into this modification
- LB-000067C - This modification provides direction on how to improve consistency in the recording and reporting of structures for all TEM methods for the Libby Project. It also consolidates the three modifications applicable to all TEM methods into a single modification.



- LB-000092 – This modification applies to two sets of tree bark samples and two sets of duff samples received at Reservoirs Environmental laboratory in Denver, CO in October, 2012 that were not prepared as specified or intended by the applicable project-specific SOPs.

QATS also reviewed during the quarter and provided comments to the SOP, “*SOP for Sampling of Sediment Porewater Using Modified Whitlock-Vibert Boxes*”.

Task 2 – Libby Amphibole Laboratory-specific Mentoring Program Support

QATS participated in three Libby Laboratory Conference Calls during this performance period, which are summarized below by date and topics discussed:

04/24/2013 Conference Call:

- Libby laboratory modification(s) update
- TEM inter-laboratory study progress
- TEM turn-around-times (TAT)
- PLM TATs
- New chain-of-custody (COC) SOP
- Laboratory modification LB-000066E discussion

05/29/2013 Conference Call:

- Fluidized Bed TEM-ISO clarifications
- Libby lab modification status update
- Laboratory Modification LB-000091
- TEM inter-laboratory studies
- General deliverable due dates

06/26/2013 Conference Call:

- Deliverable due dates
- TEM inter-laboratory studies status
- Libby laboratory modification status
- Air cassette loose debris discussion
- Duff and tree bark SOP issues

For each conference call, QATS provided input to each discussion topic, compiled notes, and distributed these notes as minutes to the TOPO.

Task 3 – Track and Coordinate Quality Control (QC) Sample Programs

The following laboratory QC support was provided by QATS during the second quarter of 2013:

- QATS continued to work with all of the laboratories to ensure that the paperwork associated with the re-preps for the 2010, 2011, and 2012 TEM inter-laboratory studies were complete, accurate, and met the requirements described in Laboratory Modification LB-000029D.
- Review by QATS of the hard copy and electronic deliverables associated with the 2010, 2011, and 2012 TEM inter-laboratory studies, which were completed on 6/21/2013, continued during the quarter.

- QATS continued the review of laboratory and sample preparation facility (SPF) quality control analyses during the quarter. The reviews are conducted to ensure compliance with the applicable project-specific criteria as described in Laboratory Modifications LB-000073C, LB-000029D, and other relevant quality documents.
- Review by QATS of PLM data associated with the 2012 PLM inter-laboratory studies and PESs distributed during the same time frame continued during the quarter. All results are being evaluated to ensure compliance with the project-specific criteria as described in Laboratory Modification LB-000073C.

QATS participated in ten Scribe weekly conference calls held during the quarter on 4/03/2013, 4/10/2013, 4/17/2013, 4/24/2013, 5/01/2013, 5/15/2013, 5/29/2013, 6/05/2013, 6/19/2013, and 6/26/2013. Topics discussed on these calls included:

- Significant structural changes to the database
- Identified discrepancies and suggested corrections or adjustments
- Overall improvements to user interaction

Task 4 – Asbestos Sample Data Validation

QATS continued the validation of 5% of the Libby deliverables analyzed from 2010 through 2012. During the quarter, analyses for TEM, PLM, and PCM were validated. A total of 120 validation reports were prepared and are in final review. They will be submitted at the beginning of the next quarter.

A conference call was held on 4/23/2013 between EPA, QATS, and CDM Smith to discuss CDM's review of the draft SOP for asbestos TEM data validation that was submitted in the previous period to EPA Region 8 for review. It was agreed by all parties that the same comments EPA and CDM Smith on this SOP would also be applied to the draft PLM and PCM data validation SOPs as relevant. QATS revised the draft PCM, PLM, and TEM data validation SOPs based on these comments, and on 6/24/2013 the three SOPs were submitted to EPA Region 8 for review. EPA Region 8 approved the three SOPs on 6/25/2013, and QATS submitted them to EPA-ASB on 6/26/2013 for final review and approval. The SOP titles are as follows:

- SOP QATS-70-094-01 (Standard Operating Procedure for the Validation of Polarized Light Microscopy (PLM) Data Deliverables)
- SOP QATS-70-095-01 (Standard Operating Procedure for the Validation of Transmission Electron Microscopy (TEM) Data Deliverables)
- SOP QATS-70-096-02 (Standard Operating Procedure for the Validation of Libby Phase Contrast Microscopy (PCM) Data Deliverables)

Task 5 – Asbestos Laboratory On-site Audit Support

The seven 2013 asbestos on-site laboratory audits scheduled by EPA for 2013 are (with one exception) one day audits focused on resolving deficiencies identified during the 2012 audits and any issues discovered from QC analysis and validation activities. The one exception is the EMSL-NY laboratory, which is new to the program. The audit performed on this laboratory was a routine audit requiring evaluation of all areas of the laboratory. The following on-site audits were performed during the quarter:

- EMSL, Denver, CO (EMSL-CO) – 05/07/2013
- ESAT Region 8, Golden, CO (ESAT) – 05/08/2013
- Reservoirs, Denver, CO (RESI) – 05/09/2013
- EMSL, New York, NY (EMSL-NY) – 05/22/2013

There were no significant findings observed during the on-site audits that would warrant immediate corrective actions.

The following on-site audits are scheduled for the next quarter:

- EMSL Analytical, Libby, MT (EMSL-MT) – 7/09/2013
- Sample Preparation Facility, Troy, MT (SPF) – 7/11/2013
- Hygeia Laboratories, Sierra Madre, CA (HYGEIA) – 8/28/2013

The due dates for on-site audit summary reports for the four audits completed during the second quarter have been extended to accommodate higher priority efforts required by Region 8 under other tasks including completion of the Annual Summary Report. The on-site audit reports will be prepared as soon as this backlog is addressed.

Task 6 – Provide Quarterly Report as a Memorandum

The First (1st) Quarter 2013 Quarterly Report was submitted to EPA on 04/30/2013.

Task 7 – Participate in Quarterly Laboratory Conference Calls

No activities were assigned during the quarter.

Task 8 – Provide Annual Summary Report of all QA Activities Performed During the Year

The annual summary report due date of all QA activities performed during the year was extended to August 26, 2013 to allow time for outstanding data (i.e., PDFs, EDDs, calibration data, etc.) from ESAT to be submitted to QATS. These data will be evaluated and incorporated into the Annual Summary Report.

Task 9 – Modify Existing Libby Site-wide QAPP

QATS submitted a final copy of the Site-wide Quality Assurance Reference Document (QARD) (rev. 1) to EPA on 3/6/2013. On 4/1/2013 EPA submitted a final copy of the Site-wide QARD (rev. 1) to the contractor CDM Smith for review, who submitted their comments to EPA on 4/9/2013. QATS is in the process of revising the Site-wide QARD to incorporate the latest comments received from CDM Smith. QATS will submit a final copy of the report during the next quarter.